

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION BUREAU,  
THE PEOPLE OF THE STATE OF NEW YORK, BY  
LETITIA JAMES, ATTORNEY GENERAL OF THE  
STATE OF NEW YORK, STATE OF COLORADO, ex  
rel. PHILIP J. WEISER, ATTORNEY GENERAL,  
STATE OF DELAWARE, ex rel. KATHLEEN  
JENNINGS, ATTORNEY GENERAL, STATE OF  
DELAWARE, THE PEOPLE OF THE STATE OF  
ILLINOIS, through ATTORNEY GENERAL KWAME  
RAOUL, THE STATE OF MINNESOTA, by its  
ATTORNEY GENERAL, KEITH ELLISON, THE  
STATE OF NORTH CAROLINA, ex rel. JOSHUA H.  
STEIN, ATTORNEY GENERAL, THE STATE OF  
WISCONSIN,

Plaintiffs,

v.

STRATFS, LLC (F/K/A STRATEGIC FINANCIAL  
SOLUTIONS, LLC), STRATEGIC CLIENT SUPPORT,  
LLC (F/K/A PIONEER CLIENT SERVICES, LLC),  
STRATEGIC CS, LLC, STRATEGIC FS BUFFALO,  
LLC, STRATEGIC NYC, LLC, BCF CAPITAL, LLC,  
T FIN, LLC, STRATEGIC CONSULTING, LLC,  
VERSARA LENDING, LLC, STRATEGIC FAMILY,  
INC., ANCHOR CLIENT SERVICES, LLC (NOW  
KNOWN AS CS 1 PAAS SERVICES, LLC),  
BEDROCK CLIENT SERVICES, LLC, BOULDER  
CLIENT SERVICES, LLC, CANYON CLIENT  
SERVICES, LLC, CAROLINA CLIENT SERVICES,  
LLC, GREAT LAKES CLIENT SERVICES, LLC,  
GUIDESTONE CLIENT SERVICES, LLC, HARBOR  
CLIENT SERVICES, LLC, HEARTLAND CLIENT  
SERVICES, LLC, MONARCH CLIENT SERVICES,  
LLC (NOW KNOWN AS CS 2 PAAS SERVICES,  
LLC), NEWPORT CLIENT SERVICES, LLC,  
NORTHSTAR CLIENT SERVICES, LLC, OPTION 1  
CLIENT SERVICES, LLC, PIONEER CLIENT  
SERVICING, LLC, ROCKWELL CLIENT SERVICES,  
LLC, ROYAL CLIENT SERVICES, LLC,  
STONEPOINT CLIENT SERVICES, LLC, SUMMIT  
CLIENT SERVICES, LLC (NOW KNOWN AS CS 3  
PAAS SERVICES, LLC), WHITESTONE CLIENT  
SERVICES, LLC, RYAN SASSON, JASON BLUST,  
and UNIDENTIFIED JOHN DOES 1-50,

Defendants, and

Misc. Case No.

**NOTICE OF ORDER  
APPOINTING RECEIVER  
PURSUANT TO 28 U.S.C. § 754**

United States District Court  
Western District of New York  
Case No. 1:24-cv-00040-JLS-MJR

DANIEL BLUMKIN, ALBERT IAN BEHAR,  
STRATEGIC ESOP, STRATEGIC ESOT, TWIST  
FINANCIAL, LLC, DUKE ENTERPRISES, LLC,  
BLAISE INVESTMENTS, LLC, THE BLUST FAMILY  
IRREVOCABLE TRUST THROUGH DONALD J.  
HOLMGREN, TRUSTEE, JACLYN BLUST, LIT DEF  
STRATEGIES, LLC, and RELIALIT, LLC,

Relief Defendants.

**NOTICE OF ORDER APPOINTING RECEIVER  
PURSUANT TO 28 U.S.C. § 754**

United States District Court  
Western District of New York  
Case No. 1:24-cv-00040-JLS-MJR

On January 10, 2024, the Consumer Financial Protection Bureau, the People of the State of New York, by Letitia James, Attorney General of the State of New York, State of Colorado, *ex rel.* Philip J. Weiser, Attorney General, State of Delaware, *ex rel.* Kathleen Jennings, Attorney General, State of Delaware, the People of the State of Illinois, through Attorney General Kwame Raoul, the State of Minnesota, by its Attorney General, Keith Ellison, the State of North Carolina, *ex rel.* Joshua H. Stein, and Attorney General, the State of Wisconsin, filed a Complaint for Injunctive Relief, Restitution, and Civil Money Penalties in the United States District Court for the Western District of New York, Case No. 1:24-cv-00040-JLS-MJR.

Attached hereto as Exhibit A is a true and correct copy of the Complaint. Court-Appointed receiver, Thomas W. McNamara (“Receiver”), by and through the undersigned counsel, hereby provides notice, pursuant to 28 U.S.C. § 754, that on January 11, 2024, the Court entered an *Ex Parte* Temporary Restraining Order with an Asset Freeze, Appointment of a Receiver, and Other Equitable Relief (“TRO”), appointing Mr. McNamara as Receiver over the Receivership Defendants (TRO, Section VIII, pages 18-19). A true and correct copy of the TRO is attached hereto as Exhibit B.

Respectfully submitted this 22nd day of January, 2024.

**HODGSON RUSS LLP**

*/s/ James C. Thoman*

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*Attorneys for Court-appointed Receiver,  
Thomas W. McNamara*